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COMMUNITY SERVICES DISTRICT, RON SHERER
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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

CHAD COATES, JOSHUA B. LUSK, JOSHUA
C. HICKS, JORDAN C. VERECE,

Plaintiffs,

vs.

CALIFORNIA PINES COMMUNITY
SERVICES DISTRICT, RON SHERER, RYAN
SHERER,

Defendants.

Case No. 2:20-cv-01112-KJM-DMC

**THIRD STIPULATION REGARDING
EXTENSION OF TIME FOR NON-EXPERT
AND EXPERT DISCOVERY DEADLINES;
ORDER**

(L.R. 144)

Plaintiffs Chad Coates et al., (“Plaintiffs”) and Defendants California Pines Community Services District (“District”) et al., (“Defendants”) (collectively herein, “Parties”), through their respective counsel of record, hereby stipulate to an extension of time for Non-Expert and Expert Discovery deadlines in the above-captioned action and agree as follows:

1. WHEREAS, the Parties acknowledge that the Court’s Order directs that requests to extend a deadline must be submitted and approved by the Court (Document No. 23);

2. WHEREAS, on June 10, 2021, the Parties filed a Stipulation Regarding Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order (Document 26), stipulating to a sixty

(60) day extension to complete non-expert and expert discovery and requesting the Court approve the same;

3. WHEREAS, on June 24, 2021, the Court approved the Parties' request and ordered that the non-expert and expert discovery deadlines be extended by sixty (60) days (Document 27);

4. WHEREAS, on July 21, 2021, the Parties filed a Stipulation Regarding Extension of Time for Non-Expert and Expert Discovery Deadlines; [Proposed] Order (Document 28), stipulating to a second sixty (60) day extension to complete non-expert and expert discovery and requesting the Court approve the same;

5. WHEREAS, on August 12, 2021, the Court approved the Parties' request and ordered that the non-expert and expert discovery deadlines be extended by sixty (60) days (Document 29);

6. WHEREAS, the Parties have agreed to participate in mediation with a third-party neutral, which mediation is scheduled for October 18, 2021;

7. WHEREAS, the Parties desire an additional extension to complete non-expert and expert discovery to allow the Parties to participate in mediation and continue to engage in discussions regarding potential settlement of the matter and seek to avoid any additional costs while engaging in such discussions; and

8. WHEREAS, the Parties also recognize that many of the relevant individuals in this matter are engaged in firefighter-related services and that additional time to complete non-expert and expert discovery may be necessary due to the ongoing wildfire season;

9. WHEREAS, a mandatory settlement conference is set for November 19, 2021, at 9:00 a.m. (Document 23), but no trial date has been set in this matter; and

10. WHEREAS, the Parties desire to remove the mandatory settlement conference set for November 19, 2021, and to reschedule the settlement conference to a date closer to the trial date.

11. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline for the Parties to complete non-expert discovery and all motions pertaining to non-expert discovery by one hundred fifty (150) days, to March 28, 2022;

1 12. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline
2 for the Parties to complete expert discovery and all motions pertaining to expert discovery by one
3 hundred fifty (150) days, to June 6, 2022;

4 13. THEREFORE, the Parties hereby stipulate and request that the Court continue the deadline
5 for the Parties to exchange initial lists of expert witnesses by one hundred fifty (150) days, to April 28,
6 2022; and

7 14. THEREFORE, the Parties hereby stipulate and request that the Court remove from calendar
8 the mandatory settlement conference set for November 19, 2021 and reschedule the settlement
9 conference to a date to be determined by the Court.

10 IT IS SO STIPULATED.

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12 Dated: September 29, 2021

Respectfully Submitted,

LAW OFFICE OF STEPHAN R. WATTENBERG
JUSTICE AT WORK LAW GROUP, LLP

/s/ Tomas E. Margain

STEPHAN R. WATTENBERG

TOMAS E. MARGAIN

Attorney for Plaintiffs

Chad Coates, Joshua B. Lusk, Joshua C. Hicks,
Jordan C. Verece

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20 Dated: September 29, 2021

Respectfully Submitted,

LOZANO SMITH

/s/ Anne L. Collins

ANNE L. COLLINS

GABRIELA D. FLOWERS

TRAVIS C. COCHRAN

Attorneys for Defendants

California Pines Community Services District,
Ron Sherer, Ryan Sherer

ORDER

Pursuant to the foregoing Stipulation of the Parties, and GOOD CAUSE APPEARING
THEREFORE, IT IS HEREBY ORDERED:

1. The deadline for the Parties to complete non-expert discovery and all motions pertaining to non-expert discovery is extended by one hundred fifty (150) days, to **March 28, 2022**. Motions pertaining to non-expert discovery shall be noticed to be heard by this deadline.

2. The deadline for the Parties to exchange initial lists of expert witnesses is extended by one hundred fifty (150) days, to **April 28, 2022**.

3. The deadline for the Parties to complete expert discovery and all motions pertaining to expert discovery is extended by one hundred fifty (150) days, to **June 6, 2022**. Motions pertaining to expert discovery shall be noticed to be heard by this deadline.

4. The Court sua sponte extends the deadline for hearing dispositive motions to **September 1, 2022**. Dispositive motions shall be noticed to be heard by this deadline.

5. The mandatory settlement conference set for November 19, 2021, at 9:00 a.m. is vacated and shall be rescheduled to a date to be determined by the Court.

IT IS SO ORDERED.

Dated: October 12, 2021



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE